US ERA ARCHIVE DOCUMENT

MS4 Construction Site Runoff Control Environmental Results Program

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Environmental Results Program

- What is ERP?
 - Compliance Assistance
 - Self-assessment and self-certification
 - Agency Inspections
 - Statistically based performance measurement (EBPI) to gage results and track performance changes

Typical ERP Cycle

- 1. Inventory
- 2. Statistical Baseline Inspections
- 3. Compliance Assistance
- 4. Self-Certification RTCs
- 5. Targeted Follow-Up
- 6. Statistical Post-Certification Inspections
- 7. Informed Decision Making

Auto Body Example

- Industry Inventory, Significant Compliance Issues
- Work Book & Check List
- Base Line Inspections
- Training
- Post Certification Inspections
- Analyze Results

Example of a Measurable Result MeCl Paint Stripping—RI Data

- Baseline Audits (n=40): 33% of shops used MeCl
- ERP Launch: On site <u>technical assistance</u>, <u>workshops</u>, <u>fact sheets</u>, <u>certification workbook</u> (Sec. 3.2, 7.5.4) advised shops to stop using MeCl
- Post Certification Audits (n=42): 5% used MeCl

28% Reduction in MeCl Use

= statistically significant decrease (*P*<.001)

Applying to Construction Site Runoff Control

- EPA SIG Awarded in October 2007 Work w/ URI Center for Pollution Prevention
- 3 Year Project
- Identifying Inventory All Construction Projects
 1 acre
- Determining Number of Baseline Inspections Needed
- Developing Check List
- Conducting Baseline Inspections

Sample EBPI Compliance – Baseline Results

- 33% Have Their SWPPPs on site
- 33% Conduct Inspections after Significant Rain Events
- 67% Made Provisions for Wind Erosion
- 35% Properly Maintain BMPs
- 39% Have Gravel Access Drives
- 79% Perform Good Housekeeping

Next Steps

- Develop Stakeholder Group Implementation
- Develop Training Workshops How to use the Check List to conduct a Self-Assessment
- Develop Inspection Strategy DEM Inspectors, Local Inspectors, others
- Develop Compliance Policy for Enforcement